

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK (BROOKLYN DIVISION)**

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KIRYAT BELZ JERUSALEM,

Plaintiff,

-against-

MASSACHUSETTS MUTUAL LIFE
INSURANCE COMPANY,

Defendants.

DOCKET NO. 20-cv-05810-HG-TAM

**NOTICE OF MASSACHUSETTS
MUTUAL LIFE INSURANCE
COMPANY'S MOTION FOR
SUMMARY JUDGMENT**

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PLEASE TAKE NOTICE that, upon Massachusetts Mutual Life Insurance Company's ("MassMutual") Rule 56.1 Statement of Undisputed Material Facts and the exhibits thereto, the accompanying Memorandum of Law in Support of MassMutual's Motion for Summary Judgment, and upon all prior papers and proceedings had herein, MassMutual will move that Court pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1 for an order granting summary judgment in favor of MassMutual, finding that there has been no breach of contract and dismissing Plaintiff's remaining two claims for breach of the covenant of good faith and fair dealing and declaratory judgment as they fail as a matter of law. MassMutual will move before the Honorable Hector Gonzalez, United States District Judge for the Eastern District of New York, in the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, at such time that the parties agree and the Court approves.

PLEASE TAKE FURTHER NOTICE that pursuant to this Court's May 24, 2022 order, the deadline for opposition papers to be served is July 19, 2022, and the deadline for reply papers to be served is 7/29/2022.

Dated: June 21, 2022

FAEGRE DRINKER BIDDLE & REATH LLP

By: /s/ Nolan Tully

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*Attorney for Defendant Massachusetts Mutual
Life Insurance Company*

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served on all counsel of record via e-mail on June 21, 2022.

Dated: June 21, 2022

/s/ *Nolan Tully*
Nolan Tully